



SUNNICA ENERGY FARM

EN010106

Volume 7

7.2 Planning Statement - Part 3

APFP Regulation 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009



19 October 2022
Version number: 01

Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

Sunnica Energy Farm

Planning Statement - Part 3

Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	EN010106
Application Document Reference	EN010106/APP/7.2
Author	Sunnica Energy Farm Project Team

Version	Date	Status of Version
Rev 00	18 November 2021	Application Version
Rev 01	19 October 2022	Deadline 1 Version

Introduction

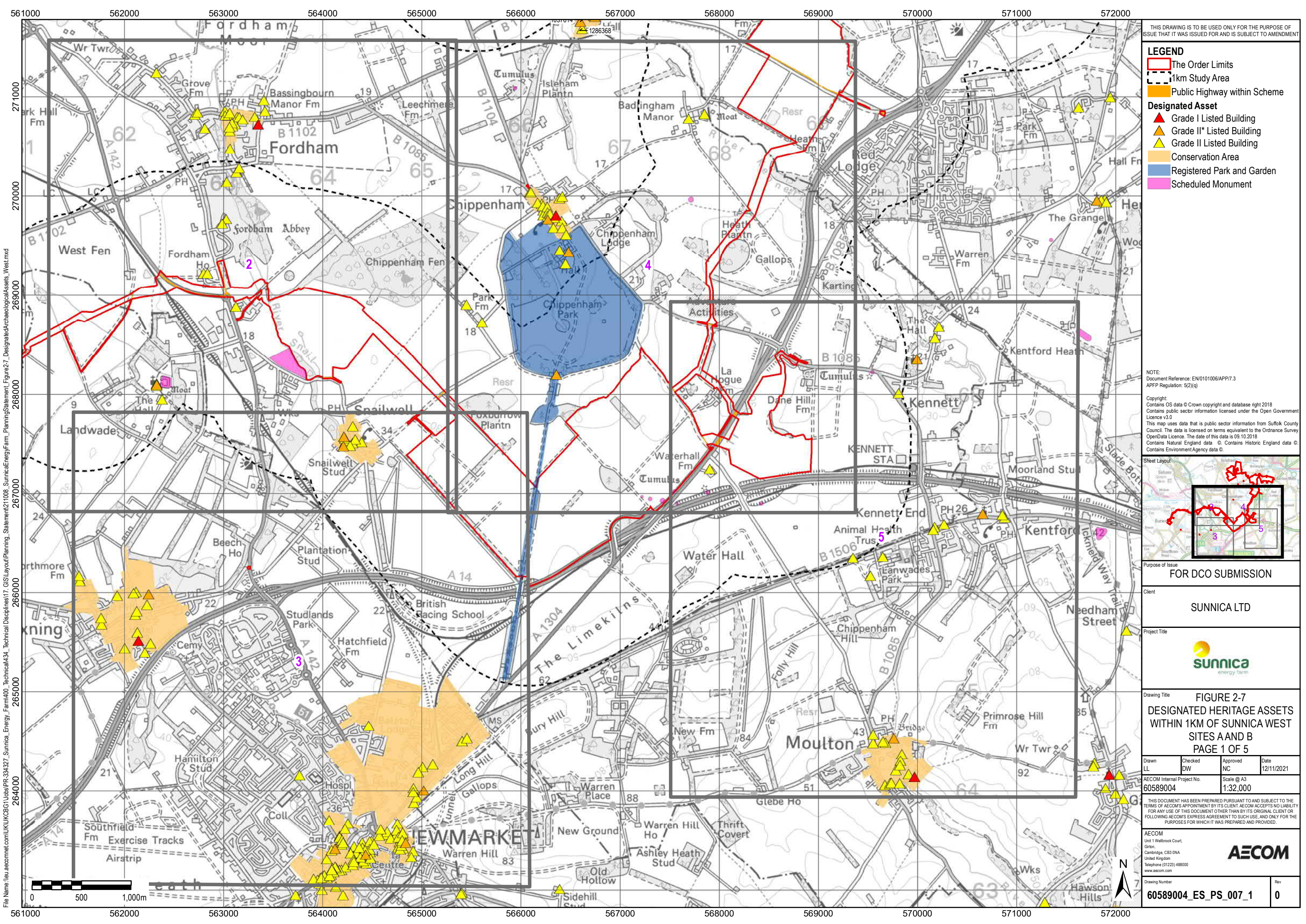
This Planning Statement - Part 3, Version 01, is submitted at Deadline 1. The changes to the content of this document compared with Planning Statement - Part 3, Version 00 [APP-263], submitted in November 2021, are as follows:

- a. Figure 2-11, Development Plan Allocations, Rev 0, replaced with Figure 2-11, Development Plan Allocations, Rev 1.

The above figure has been updated in order to illustrate the location of Allocation SA10(a) Land North of Acorn Way, which is referred to in West Suffolk Council's Relevant Representation and the Applicant's response to the Relevant Representation (ref: WSC-40 of 8.6, Sunnica responses on Relevant Representations, also submitted at this Deadline).

No other changes have been made to this document.

No changes have been made to Planning Statement - Part 1 [APP-261], nor Planning Statement - Part 2 [APP-262].



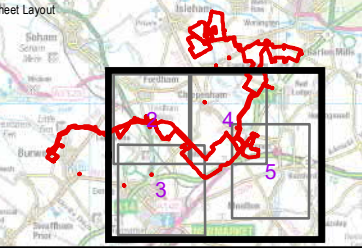
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LEGEND

- The Order Limits
- 1km Study Area
- Public Highway within Scheme
- Designated Asset**
 - ▲ Grade I Listed Building
 - ▲ Grade II* Listed Building
 - ▲ Grade II Listed Building
 - Conservation Area
 - Registered Park and Garden
 - Scheduled Monument

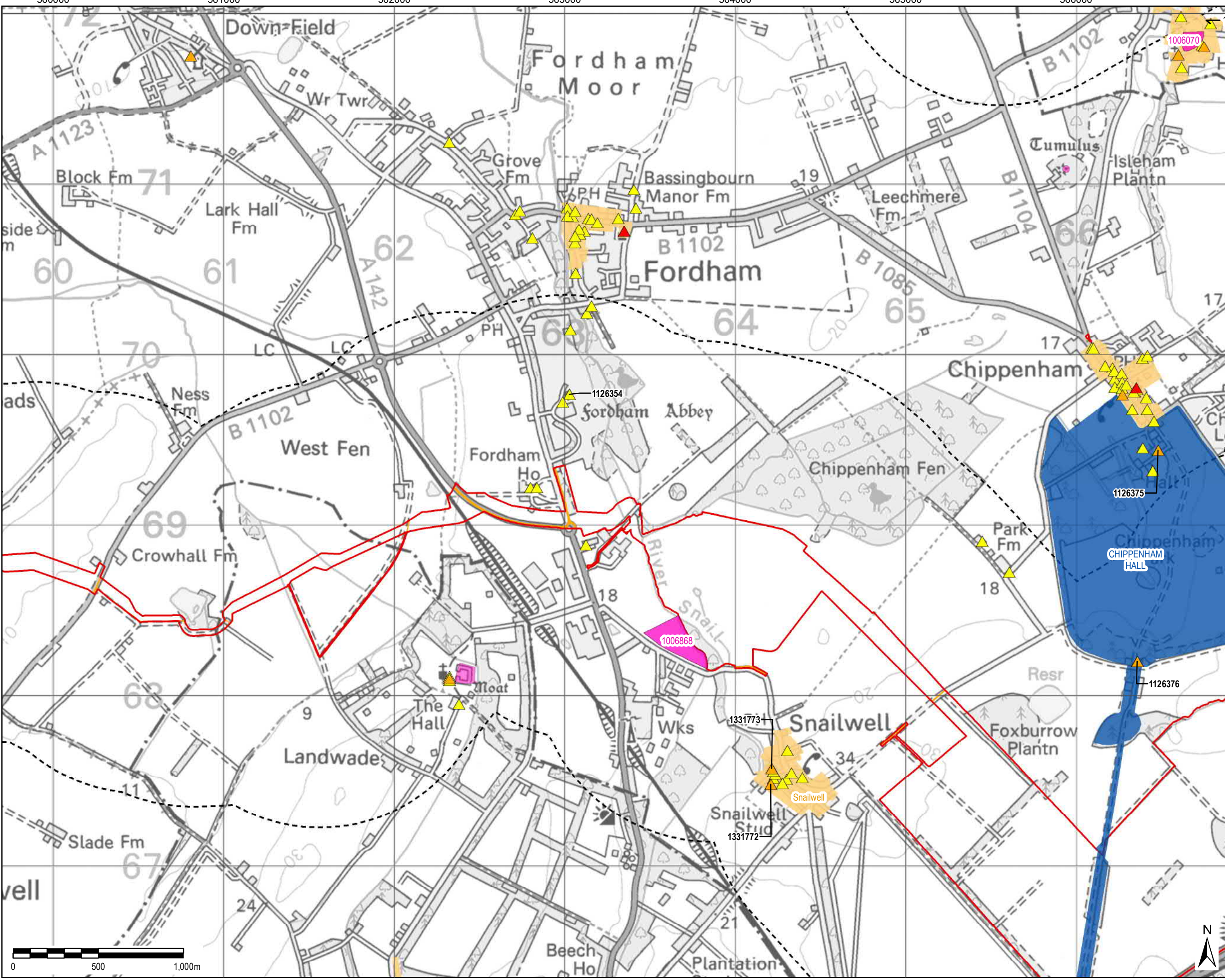
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Purpose of Issue		FOR DCO SUBMISSION	
Client		SUNNICA LTD	
Project Title			
Drawing Title		FIGURE 2-7 DESIGNATED HERITAGE ASSETS WITHIN 1KM OF SUNNICA WEST SITES A AND B PAGE 1 OF 5	
Drawn L	Checked DW	Approved NC	Date 12/11/2021
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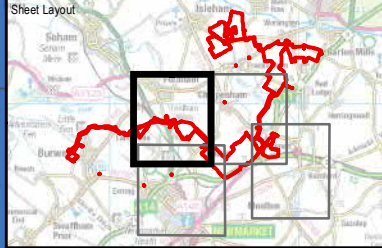


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- LEGEND**
- The Order limits
 - 1km Study Area
 - Public Highway within Scheme
 - Designated Asset**
 - Grade II* Listed Building
 - Grade II Listed Building
 - Conservation Area
 - Registered Park and Garden
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**FIGURE 2-7
DESIGNATED HERITAGE ASSETS
WITHIN 1KM OF SUNNICA WEST
SITES A AND B
PAGE 2 OF 5**

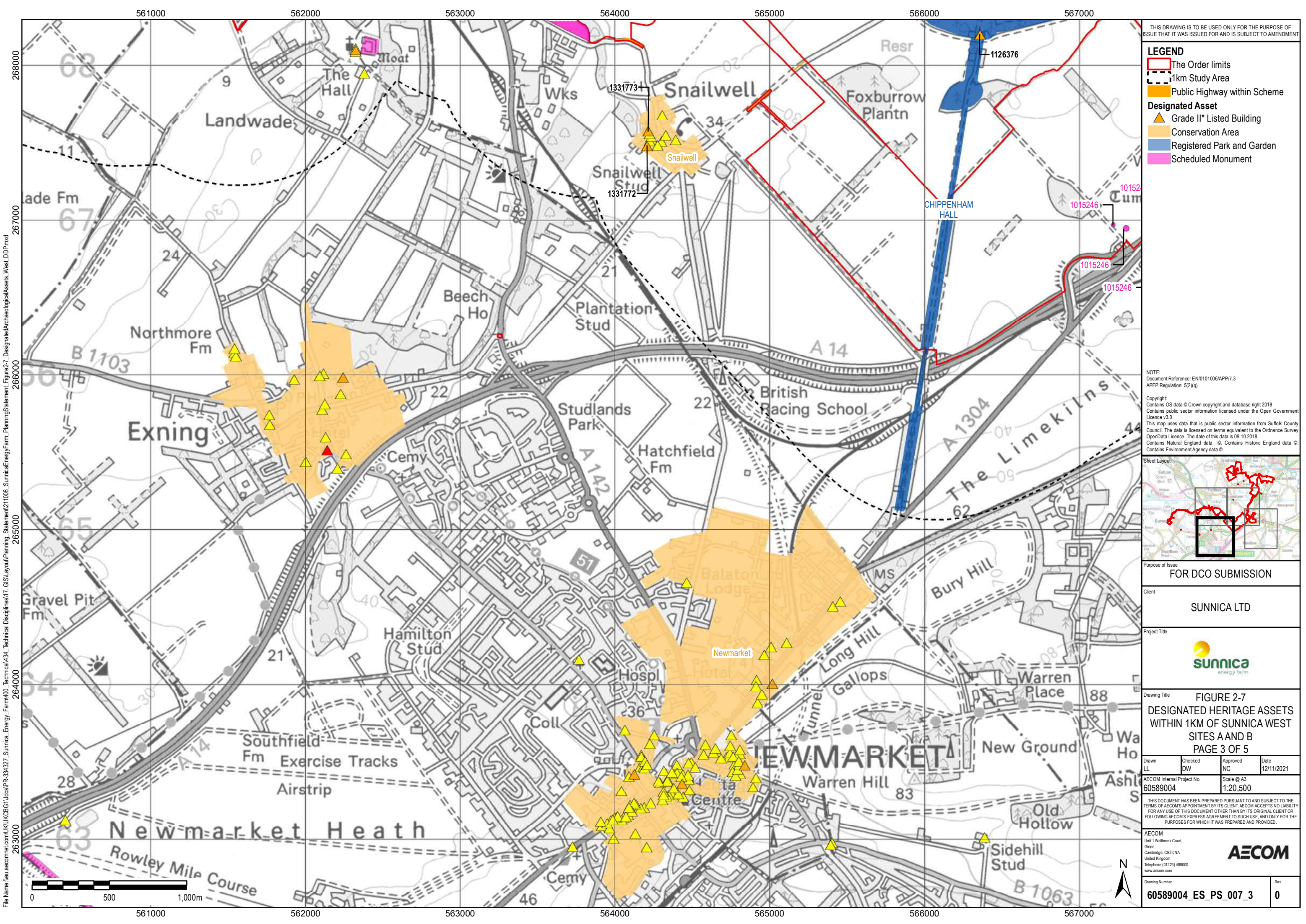
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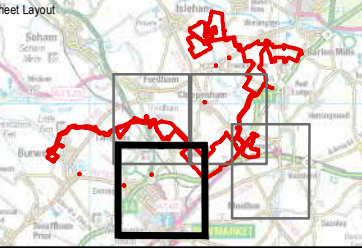
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LEGEND

- The Order limits
- 1km Study Area
- Public Highway within Scheme
- Designated Asset**
 - Grade II* Listed Building
 - Conservation Area
 - Registered Park and Garden
 - Scheduled Monument

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**FIGURE 2-7
DESIGNATED HERITAGE ASSETS
WITHIN 1KM OF SUNNICA WEST
SITES A AND B
PAGE 3 OF 5**

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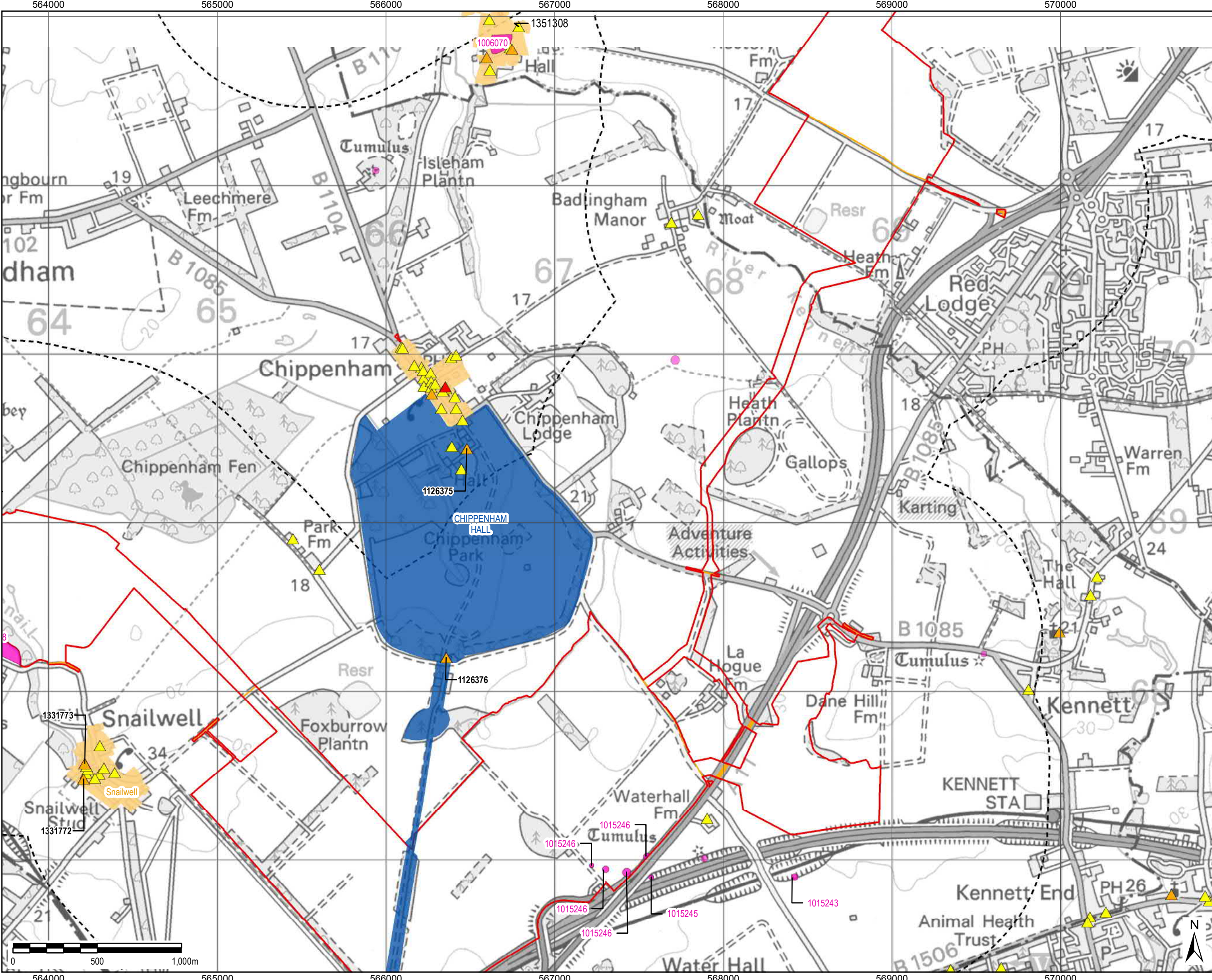
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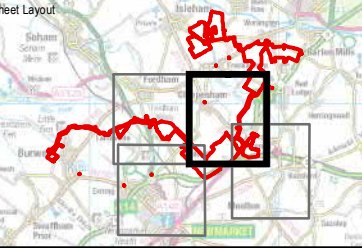
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LEGEND

- The Order limits
- 1km Study Area
- Public Highway within Scheme
- Designated Asset**
 - Grade II* Listed Building
 - Conservation Area
 - Registered Park and Garden
 - Scheduled Monument

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**FIGURE 2-7
DESIGNATED HERITAGE ASSETS
WITHIN 1KM OF SUNNICA WEST
SITES A AND B
PAGE 4 OF 5**

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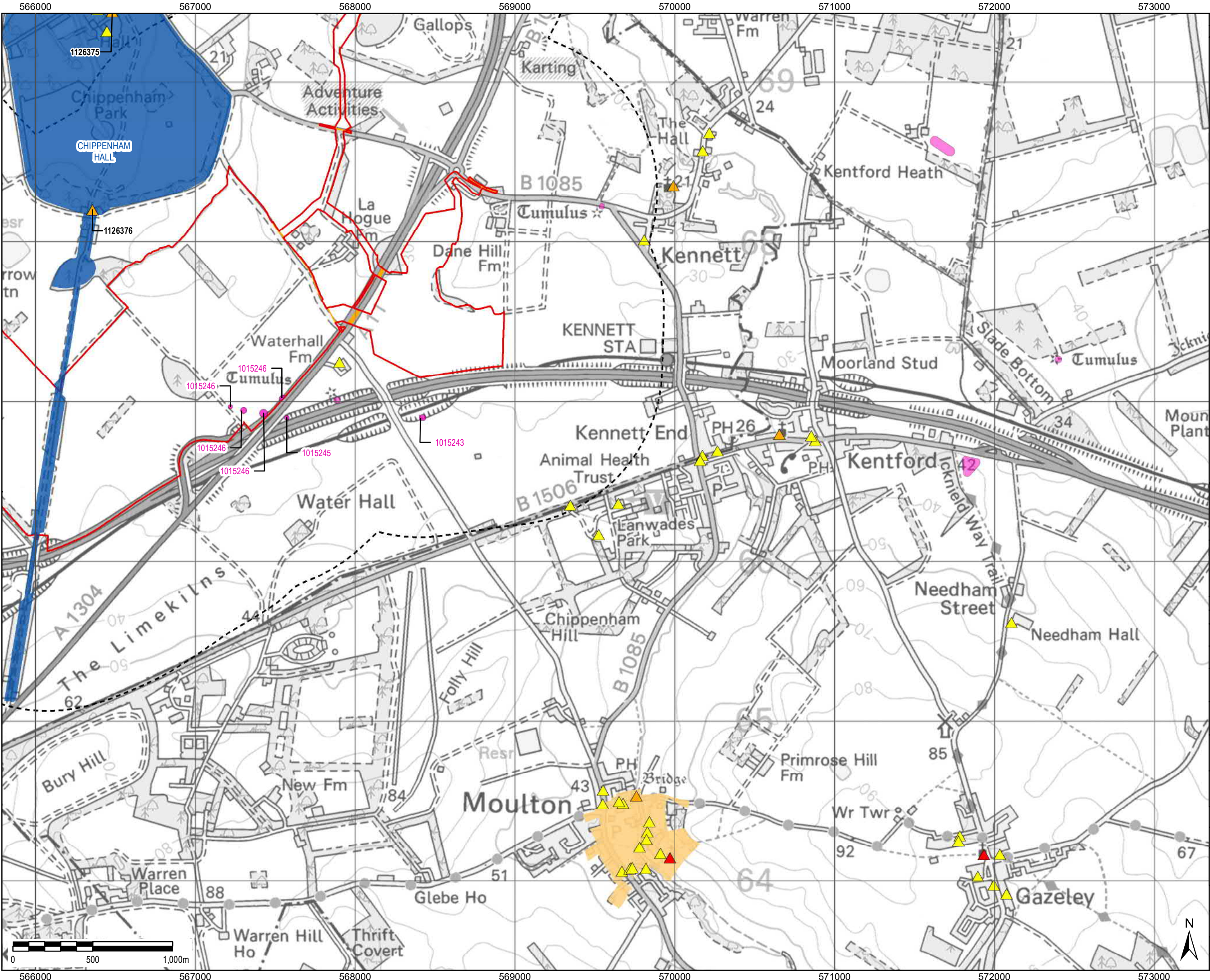
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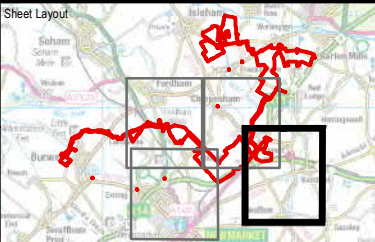


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- LEGEND**
- The Order limits
 - 1km Study Area
 - Public Highway within Scheme
 - Designated Asset**
 - ▲ Grade II* Listed Building
 - Registered Park and Garden
 - Scheduled Monument

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**FIGURE 2-7
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SITES A AND B
PAGE 5 OF 5**

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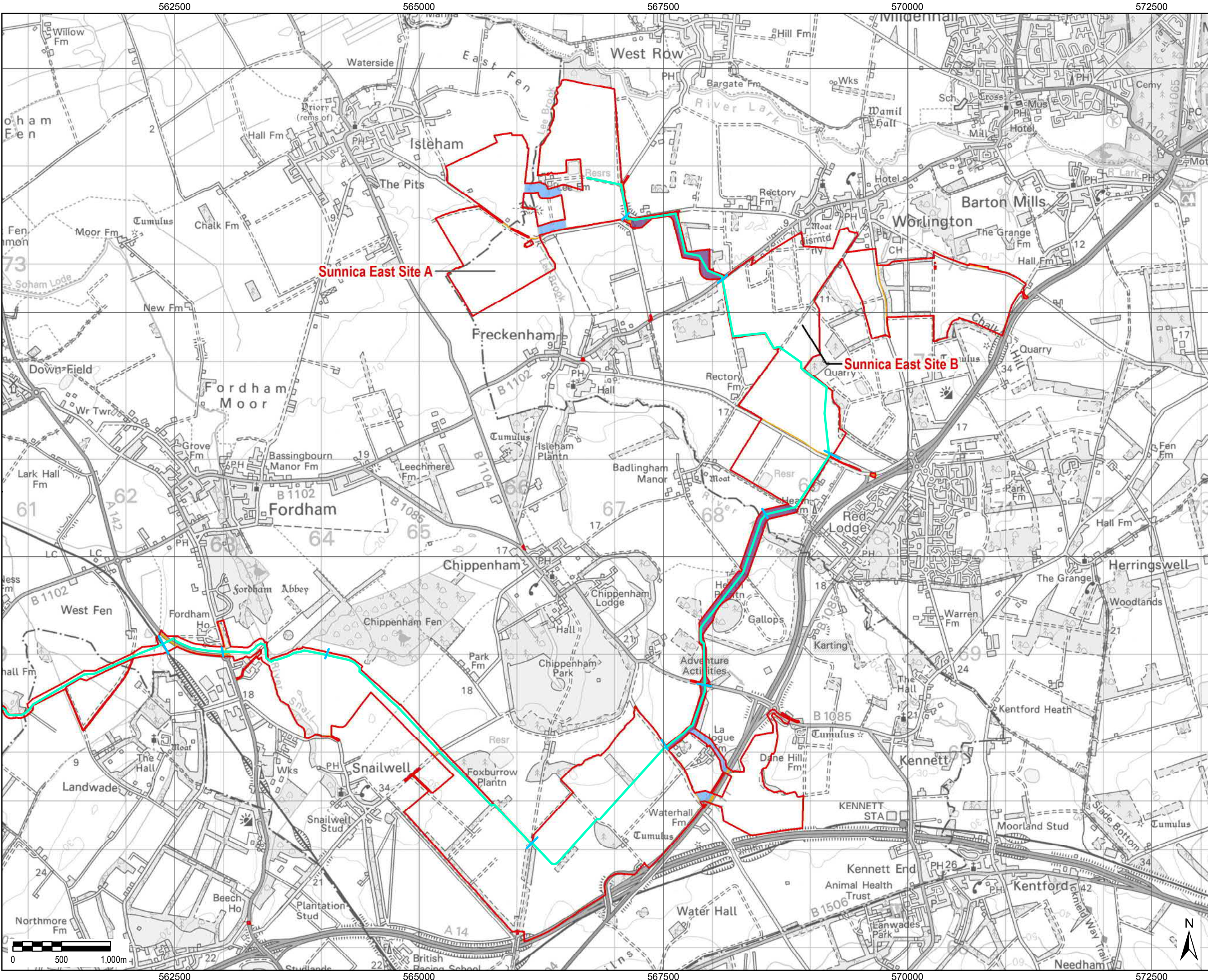
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LEGEND

- The Order limits
- Cable Construction Section
- Proposed 132kV Cable Route
- Maximum corridor for Grid Connection Route A
- High Voltage Connection Corridors
- Public Highway within Scheme

NOTE:
Public highways run through the Sunnica East Site, which are not part of the site boundary. These have been digitised based on the 1:1250 scale OS Mastermap.

Document Reference: EN010106/APP/6.3
APFP Regulation: 5(2)(a)

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**FIGURE 2-8
SUNNICA EAST
CABLE CORRIDOR**

Drawn LL	Checked DW	Approved NC	Date 11/10/2021
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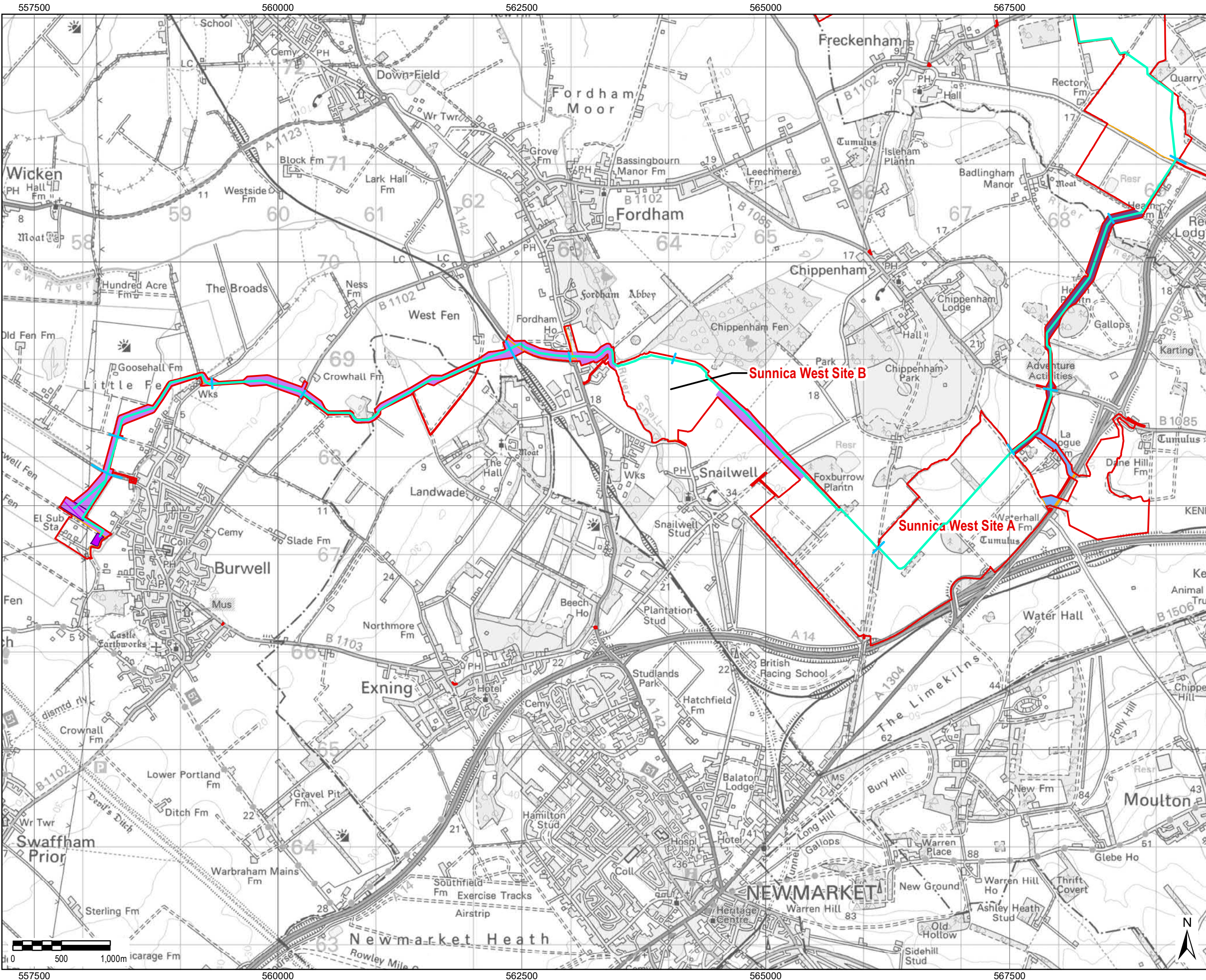
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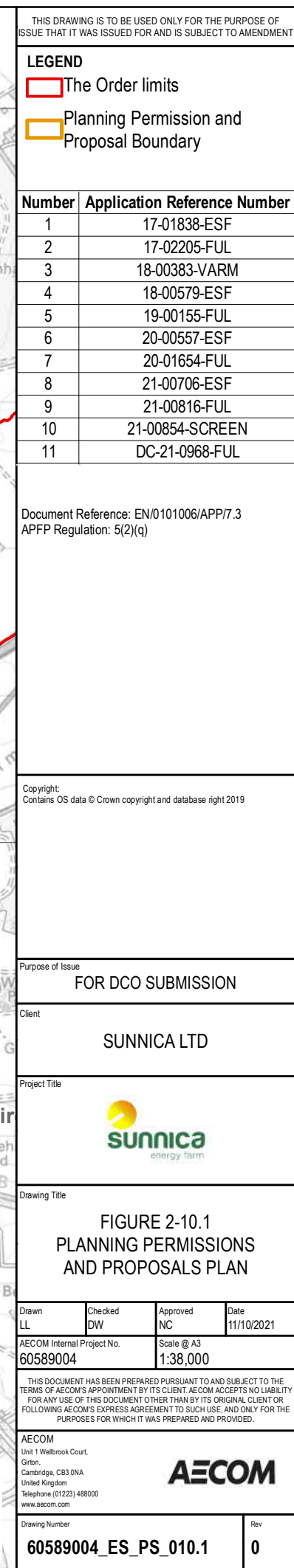
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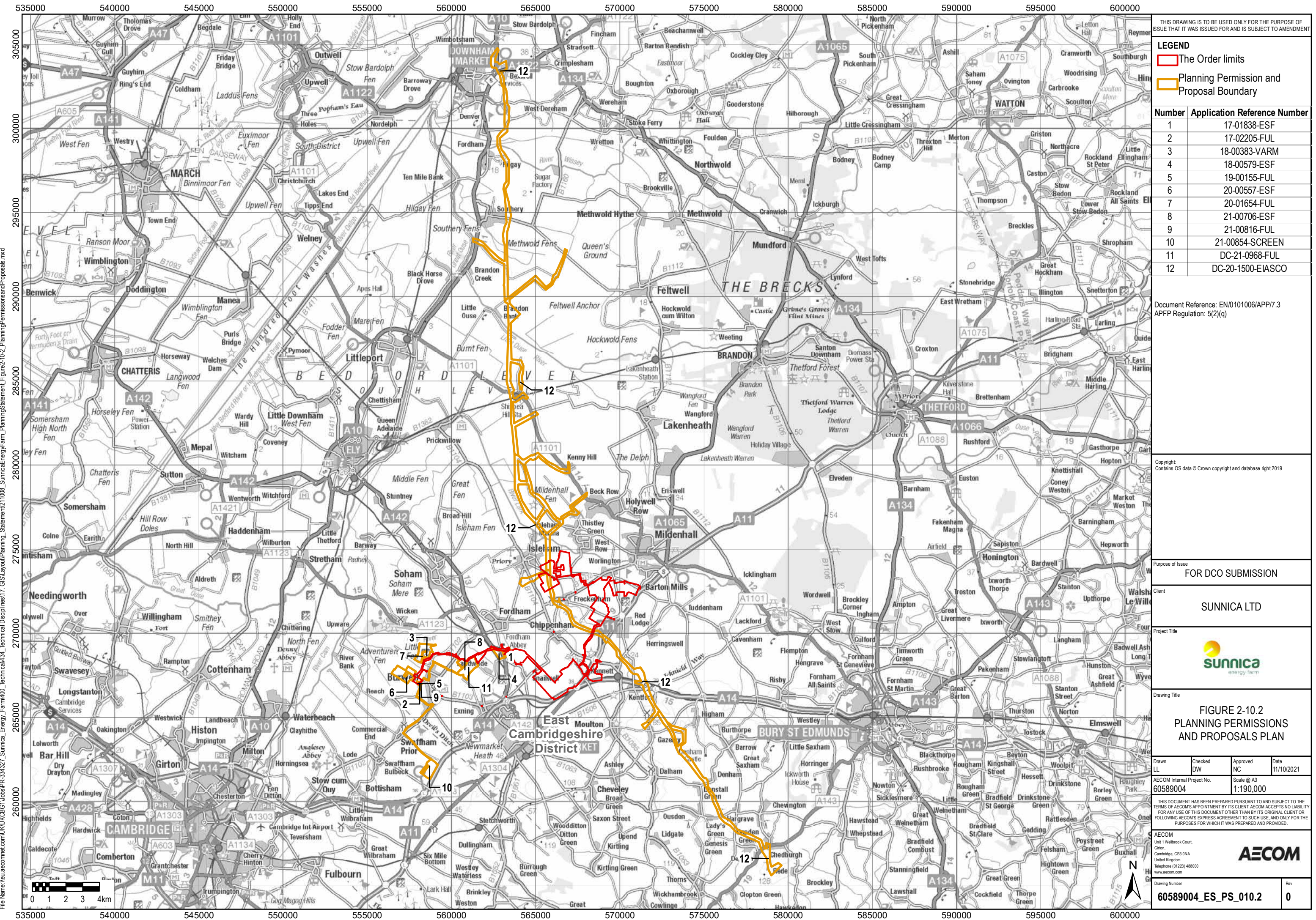
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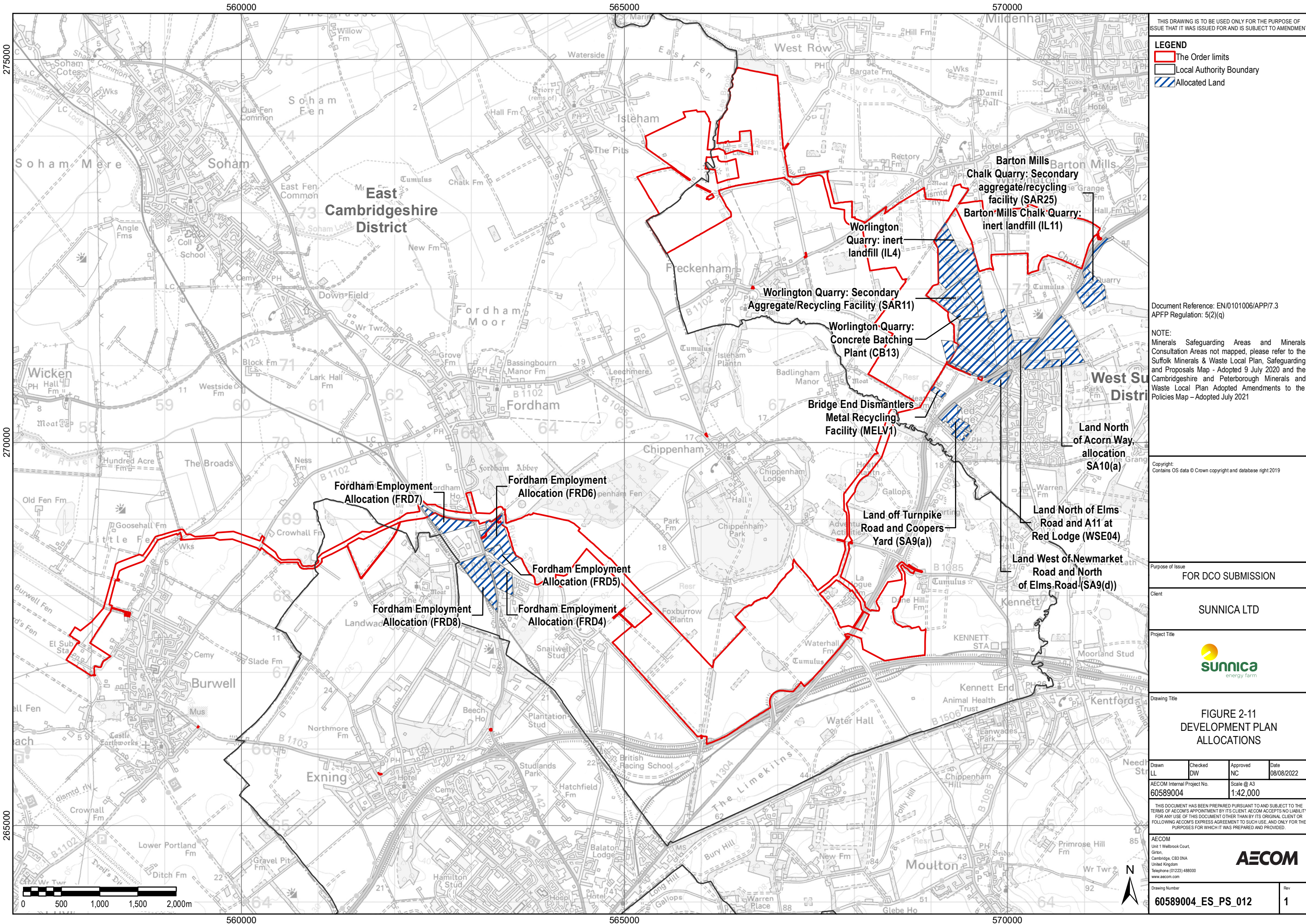
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- LEGEND**
- The Order limits
 - Local Authority Boundary
 - Allocated Land

Document Reference: EN/0101006/APP/7.3
APFP Regulation: 5(2)(q)

NOTE:
Minerals Safeguarding Areas and Minerals Consultation Areas not mapped, please refer to the Suffolk Minerals & Waste Local Plan, Safeguarding and Proposals Map - Adopted 9 July 2020 and the Cambridgeshire and Peterborough Minerals and Waste Local Plan Adopted Amendments to the Policies Map – Adopted July 2021

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**FIGURE 2-11
DEVELOPMENT PLAN
ALLOCATIONS**

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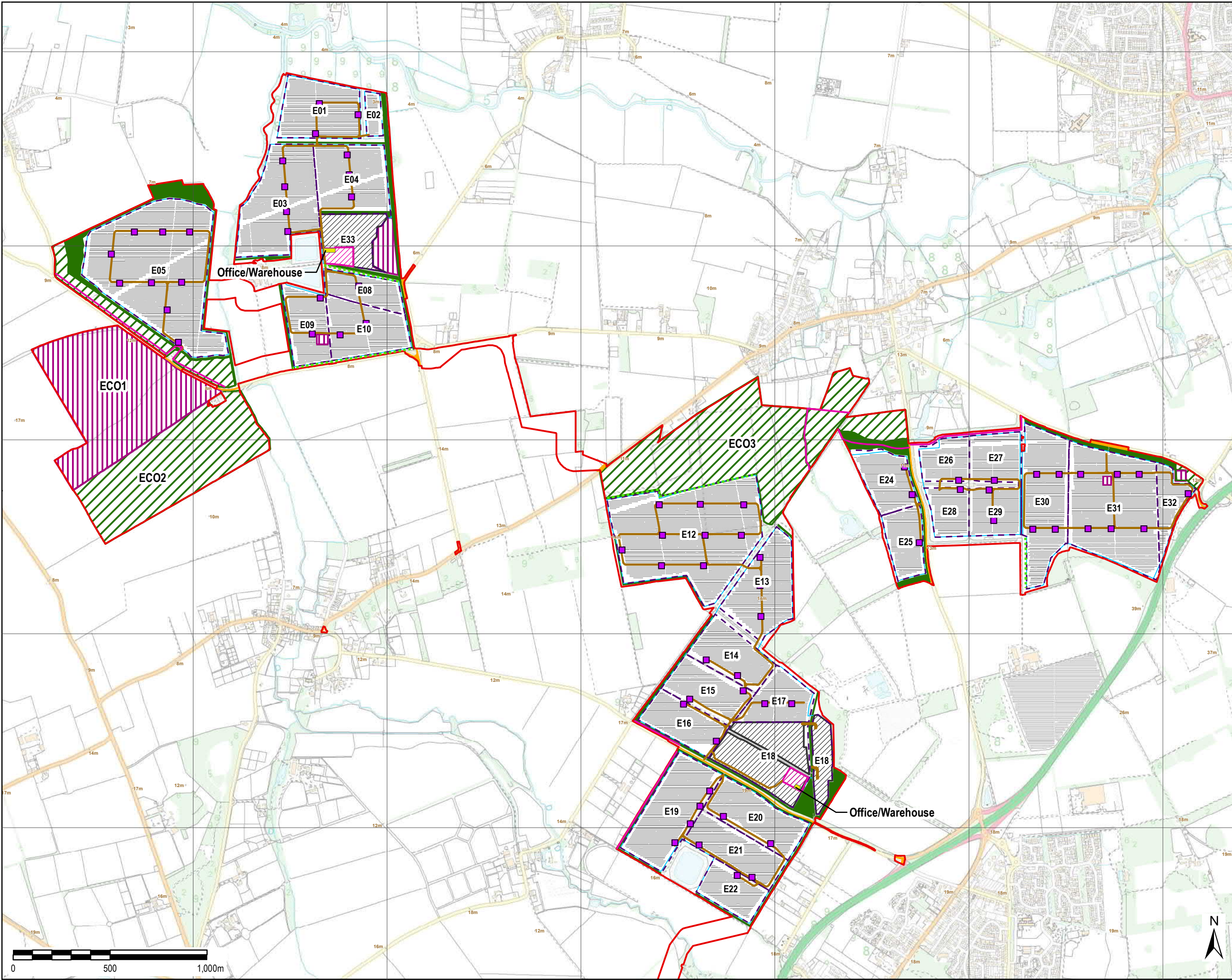
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LEGEND

- The Order limits
- Public Highway within Scheme
- Proposed Scheme Plan**
 - Developable Area
 - Boundary Fence
 - BESS and Substation
 - Compound Area (Permanent)
 - Solar PV Array
 - Illustrative Locations of Solar Stations
 - Proposed Road
 - Potential Provision of Permissive Route
- Green Infrastructure**
 - Native Grassland Planting
 - Native Grassland Planting within Archaeological Mitigation Areas
 - Proposed Woodland (new planting or infilling of existing vegetation)
 - Proposed Hedgerow (new planting or infilling of existing vegetation)

Note: Developable fields previously referred to as E06, E07, E11 and E23 are no longer being developed with solar infrastructure and now form part of the mitigation strategy, however, the field numbering for the remaining developable fields has been retained for consistency.

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APPP Regulation: 5(2)(a)

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FIGURE 3-1
SUNNICA EAST
PARAMETER PLAN

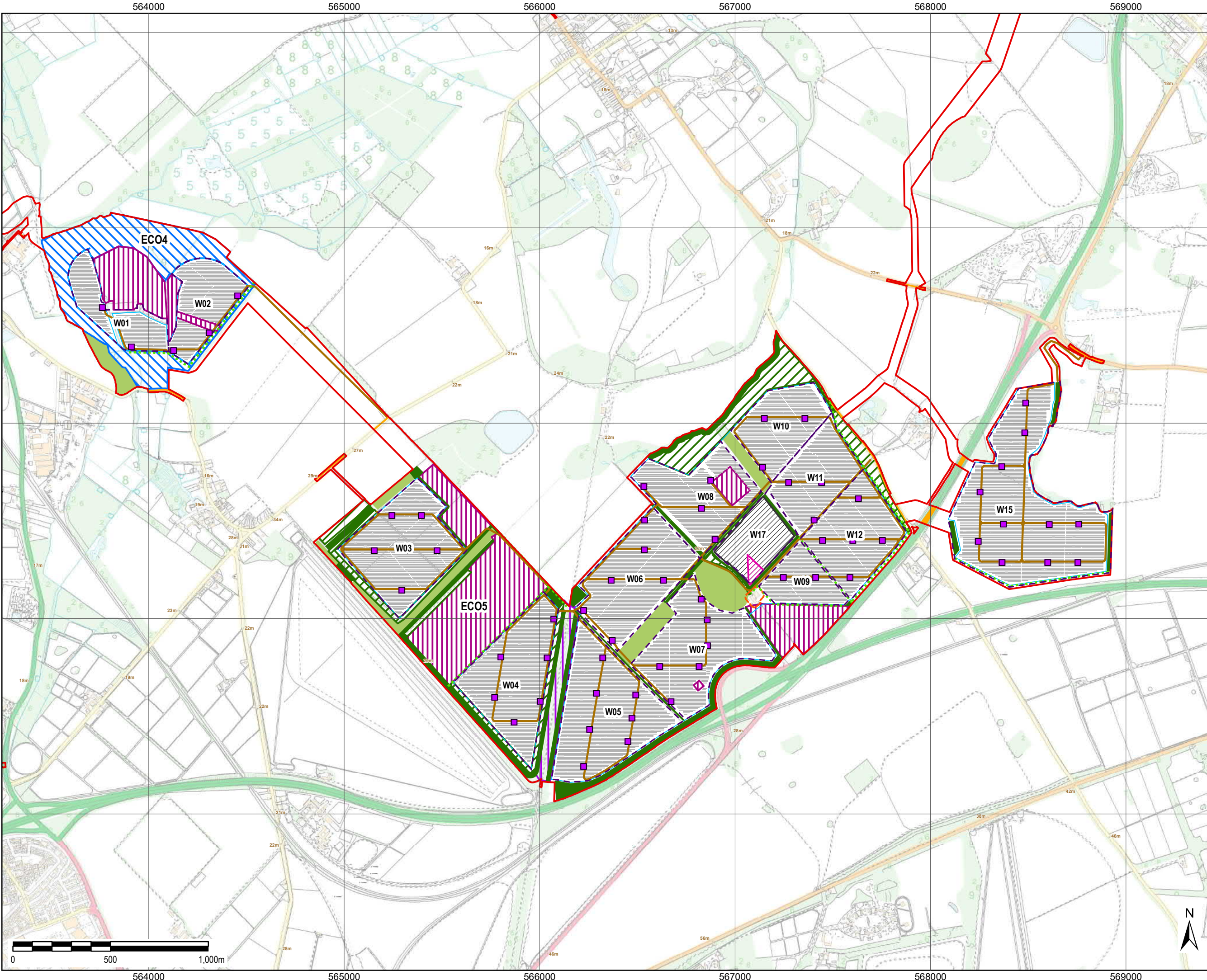
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LEGEND

- The Order limits
- Woodstore - 20m Buffer
- Public Highway within Scheme
- Proposed Scheme Plan**
- Developable Area
- Solar PV Array
- BESS and Substation
- Compound Area (Permanent)
- Boundary Fence
- Illustrative Location of Solar Stations
- Proposed Road
- Green Infrastructure**
- Native Grassland Planting
- Native Grassland Planting within Archaeological Mitigation Areas
- Native Grassland/Wetland
- Heritage Offset with additional planting along The Avenue
- Proposed Woodland (new planting or infilling of existing vegetation)
- Retained Woodland
- Proposed Hedgerow (new planting or infilling of existing vegetation)

Note: Developable fields previously referred to as W13, W14 and W15 are no longer within the Order limits; however, the field numbering for the remaining developable fields has been retained for consistency.

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FIGURE 3-2
SUNNICA WEST A AND B
PARAMETER PLAN

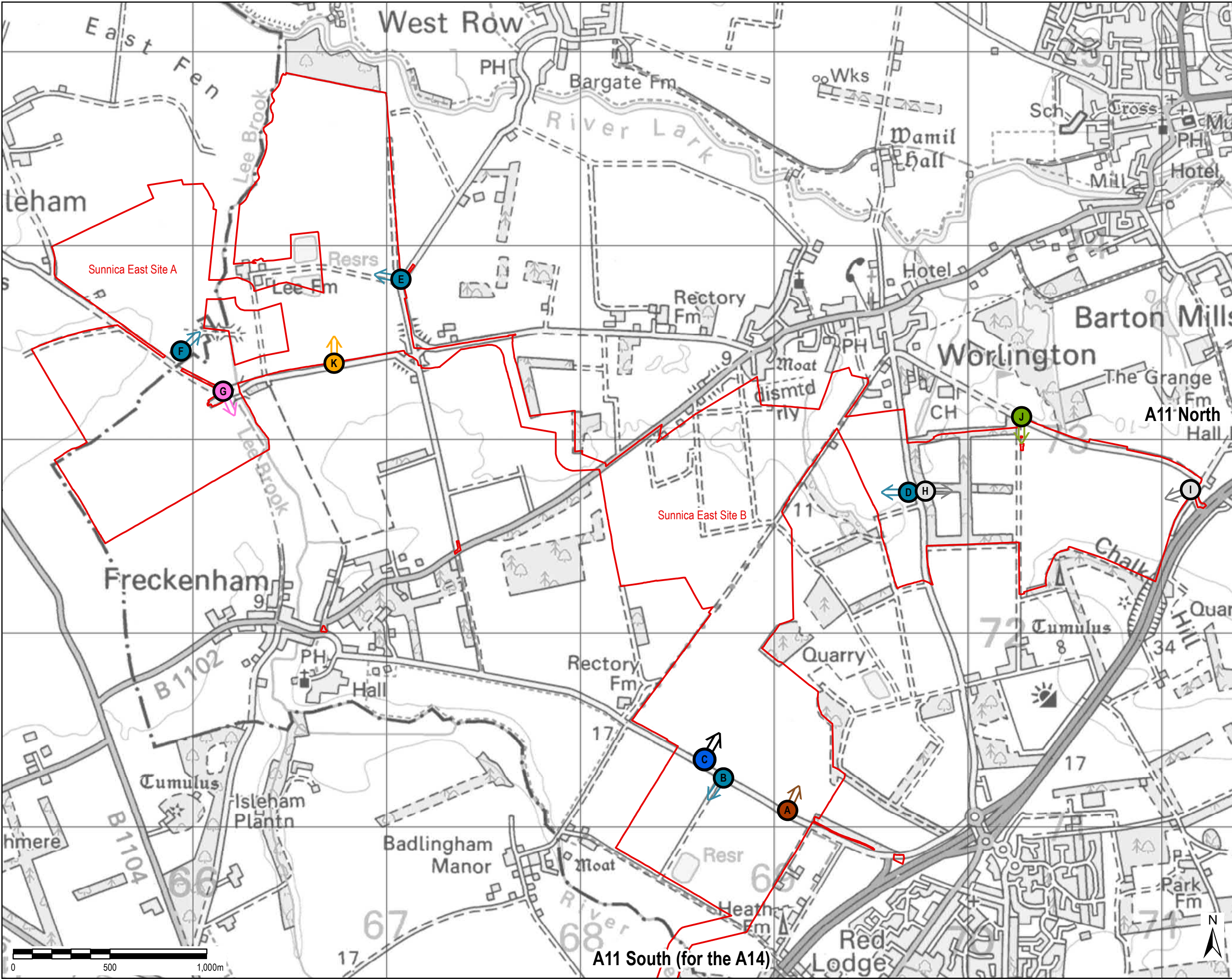
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LEGEND

- The Order limits
- Access Point**
 - Primary Access: Construction, Operation and Decommissioning
 - Crane Access: Construction, Decommissioning and for Emergency Vehicles in Operation Only
 - Secondary Access: Construction and Decommissioning Only
 - Secondary Access: Construction, Operation and Decommissioning
 - Secondary Access: Construction, Operation and Decommissioning (Not for HGV)
 - Secondary Access: Construction, Decommissioning and for Emergency Vehicles in Operation Only
 - Secondary Access: Operation only

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**FIGURE 3-3
SUNNICA EAST A AND B
SITE ACCESS LOCATIONS**

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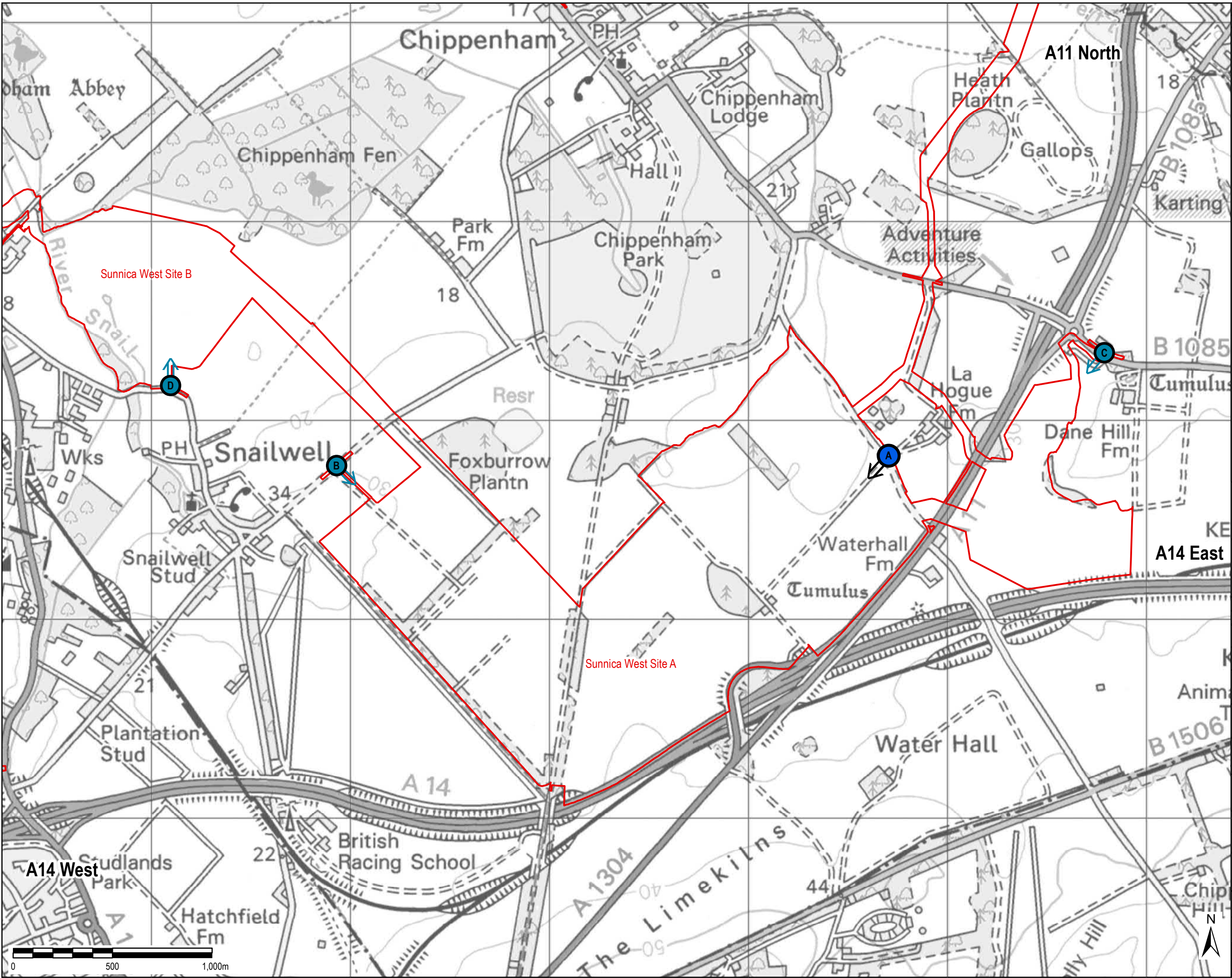
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LEGEND

The Order limits

Access Point

↑ Primary Access: Construction and Operation

↑ Secondary Access: Construction and Operation

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Purpose of Issue
FOR DCO SUBMISSION

Client
SUNNICA LTD

Project Title



Drawing Title
**FIGURE 3-4
SUNNICA WEST A AND B
SITE ACCESS LOCATIONS**

Drawn LL	Checked DW	Approved NC	Date 11/10/2021
AECOM Internal Project No. 60589004		Scale @ A3 1:17,500	

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AECOM
Unit 1 Wellbrook Court,
Gilton,
Cambridge, CB3 0NA
United Kingdom
Telephone (01223) 488000
www.aecom.com



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Appendix D Heritage Harm Assessment

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1 Introduction

- 1.1.1 The Sunnica Energy Farm (the Scheme) is a new solar energy farm proposal that would deliver electricity to the national electricity transmission network. Sunnica Limited is proposing to install ground mounted solar photovoltaic (PV) panel arrays to generate electricity energy from the sun and combine these with a Battery Energy Storage System (BESS) which will connect to the Burwell National Grid Substation in Cambridgeshire.
- 1.1.2 Electricity will be generated at Sunnica East Site A, near Isleham in Cambridgeshire; Sunnica East B, near Worlington and Freckenham in Suffolk; Sunnica West Site A near Chippenham and Kennett in Cambridgeshire; and Sunnica West Site B, near Snailwell in Cambridgeshire.
- 1.1.3 The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) and will require a Development Consent Order (DCO) from the Secretary of State for Business, Energy and Industrial Strategy, due to its generating capacity exceeding 50 MW.
- 1.1.4 Legislation and national planning policy considered relevant to the determination of the DCO application identifies the need to present an assessment of harm to designated heritage assets affected by the Scheme and consider this in the decision as to whether to grant a DCO. The purpose of this Heritage Harm Statement is to set out the assessment of harm that the Scheme may have upon designated heritage assets. This is then used in the planning balance relating to the heritage national planning policy tests in the Planning Statement **[EN010106/APP/7.2]** accompanying the DCO application. This Heritage Harm Statement therefore includes the following:
- a. The legislative and planning policy framework context for the assessment;
 - b. A summary of the results of the environmental impact assessment (EIA) undertaken which is presented in the Environmental Statement **[EN010106/APP/6.1]** to establish those assets affected by the Scheme with resultant harm to their significance; and for those assets where there is the potential for that harm to be substantial, a statement of significance is provided to explain the potential scale of the harm.
 - c. A conclusion as to whether substantial harm is caused.
 - d. **Table 1** presents the level of harm for each designated heritage asset affected by the Scheme.
- 1.1.5 The EIA relating to Cultural Heritage is presented in the Environmental Statement (ES) **Chapter 7: Cultural Heritage [EN010106/APP/6.1]**. This Heritage Harm Statement draws upon the information presented in the ES **[EN010106/APP/6.1]**.

2 Legislative and Planning Policy Framework

2.1 The Infrastructure Planning (Decisions) Regulations 2010 (as amended)

- 2.1.1 The Infrastructure Planning (Decisions) Regulations 2010 (as amended) (Ref. 1) apply to the determination of DCO applications under the Planning Act 2008. Regulation 3 requires the Secretary of State to have regard to the following when deciding an application:
- a. For an application which affects a listed building or its setting, the Secretary of State 'must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses'.
 - b. For an application relating to a conservation area, the Secretary of State 'must have regard to the desirability of preserving or enhancing the character or appearance of that area'.
 - c. For an application for development consent which affects or is likely to affect a scheduled monument or its setting, the Secretary of State 'must have regard to the desirability of preserving the scheduled monument or its setting'.

2.2 Ancient Monuments and Archaeological Areas Act 1979 (amended by the National Heritage Act 1983 and 2002)

- 2.2.1 The Ancient Monuments and Archaeological Areas Act 1979 (amended by the National Heritage Act 1983 and 2002) (Ref. 2) affords protection to any asset identified on the schedule of nationally important archaeological sites, known as Scheduled Monuments. Pursuant to section 33 of the Planning Act 2008, the notice and consent requirements under this Act do not apply to DCO development proposals.

2.3 Overarching National Policy Statement for Energy (EN-1)

- 2.3.1 The overarching NPS for Energy (NPS EN-1) (Ref. 4) was adopted in July 2011 and sets out the overall national energy policy for delivering major energy infrastructure.
- 2.3.2 Part 5 of the statement sets out guidance on generic impacts for the Applicant's assessment and decision-making on the application. These impacts concern, amongst other matters, the historic environment. The document sets out a phased progression to the heritage assessment, emphasising the need to understand the significance of a heritage asset and the contribution of their setting to that significance (paragraph 5.8.8) before assessing the extent to which that significance is impacted.
- 2.3.3 When assessing impact, NPS EN-1 identifies the potential for the significance of an asset to be harmed or lost through development. Paragraph 5.8.14 states that '[l]oss affecting any designated heritage asset should require clear and convincing justification'. This harm is described in terms of substantial harm or loss of significance. A distinction is given between substantial harm to or loss of a grade II listed building, park or garden which should be exceptional and substantial

harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, which should be wholly exceptional.

- 2.3.4 Paragraph 5.8.15 provides guidance on how harm should be weighed within the planning balance and states 'Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development'. This recognises that a scale needs to be employed so that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. The document is clear that consent should be refused for any scheme which will lead to substantial harm to or total loss of significance of a designated heritage *'unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm'*.
- 2.3.5 NPS EN-1 makes allowance for those assets with archaeological interest not currently designated, but which are demonstrably of equivalent significance to scheduled monuments (paragraph 5.8.4). Within this it includes those assets which have *'yet to be formally assessed for designation'*. When such an asset is identified as being affected by a development, paragraph 5.8.5 makes it clear that the same policy considerations should be applied as those that apply to designated assets. This is applicable to the Scheme and should any non-designated assets of schedulable quality have been identified, these would have been included in **Table 1**. However, no such assets have been identified.

2.4 National Planning Policy Framework

- 2.4.1 The National Planning Policy Framework (NPPF) (Ref. 5) was originally published in 2012 and most recently updated in July 2021. This document provides more detail regarding the assessment of harm to heritage assets and is supported by the Planning Practice Guidance.
- 2.4.2 The NPPF sets out the importance of being able to assess the significance of heritage assets that may be affected by a development. Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Similarly, there is a requirement on local planning authorities, having assessed the particular significance of any heritage asset that may be affected by a proposal, to take this into account when considering the impact of a proposal on a heritage asset (paragraph 195). Significance is defined in Annex 2 as being the, *'value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'*. Significance is not only derived from an asset's physical presence, but also from its setting. The setting of a heritage asset is defined in Annex 2 as, *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*.
- 2.4.3 Where the NPPF differs from NPS EN-1 is the categorisation of harm into 'substantial' and 'less than substantial'. Paragraphs 199 to 203 of the NPPF

introduce the concept that heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm ranges from less than substantial through to substantial. In instances where development would cause substantial harm to or total loss of significance of a designated asset consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss (paragraph 201). In instances where development would cause less than substantial harm to the significance of a designated asset the harm should be weighed against the public benefits of the proposal to provide a balanced judgement (paragraph 202).

- 2.4.4 With regard to non-designated assets, there is a requirement to take a balanced judgement in determining planning applications given the scale of any harm or loss against the significance of the asset (paragraph 203). Where the asset is demonstrably of equivalent significance to scheduled monuments, it should be considered subject to the policies for designated heritage assets (footnote 68).
- 2.4.5 Paragraph 5 of the NPPF sets out that it does not contain specific policies for NSIPs and that applications for development consent are determined in accordance with the decision making framework set out by the Planning Act 2008 (as amended) and relevant NPSs, as well as any other matters that are relevant and important, which may include the NPPF. As such, although the policies of the NPPF are relevant, where there is a difference between NPS and NPPF policy the NPS will take priority. This assessment is therefore taken forward on the basis of the relevant policy set out in NPS EN-1.

2.5 Planning Practice Guidance

- 2.5.1 Further clarity on the interpretation of harm is provided within the Planning Practice Guidance (Ref. 6). Although relating to the policy outlined within the NPPF, it is transferable to the policy contained within the National Policy Statement for Energy.
- 2.5.2 The Planning Practice Guidance expands on terms such as 'significance' and its importance in decision making. Paragraph 018 states *'What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting. Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the NPPF (paragraphs 200-202) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated'*.
- 2.5.3 Paragraph 018 emphasises that substantial harm is a high test and it is important to consider whether an adverse impact 'seriously affects a key element' of an asset's significance. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed (paragraph 018).
- 2.5.4 The PPG states that in relation to setting, a thorough assessment of the impact on setting needs to take in to account, and be proportionate to, the significance of

the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it (paragraph 013).

- 2.5.5 The NPPF indicates that the degree of harm should be considered alongside any public benefits that can be delivered by development. The PPG states that these benefits should flow from the Scheme and should be of a nature and scale to be of benefit to the public and not just a private benefit and would include securing the optimum viable use of an asset in support of its long-term conservation (paragraph 020).

2.6 Historic England Guidance

- 2.6.1 Managing Significance in Decision Taking in the Historic Environment: Historic Environment Good Practice Advice Note 2 (GPA2, 2015; Ref. 7) contains Historic England's guidance on implementing historic environment policy contained within the NPPF and PPG. GPA2 emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the *'first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance'* (paragraph 4). With regard to harm, the document clarifies that change to heritage assets is inevitable, but that the change is only harmful when significance is damaged and that *'[t]he nature and importance of the significance that is affected will dictate the proportionate response to assessing that change'* (paragraph 29). The document reiterates that substantial harm is a high test (paragraph 27).

3 Methodology

- 3.1.1 All assets which have been identified as experiencing an adverse effect in the EIA have been considered within this document and are identified in Table 1 of this report. This effect can be experienced as a direct physical impact on historic fabric, or an effect as a result of changes to an asset's setting. Effects can also be experienced during the construction of the Scheme as short-term, or long-term impacts, or as a result of the operation of the Scheme.
- 3.1.2 For the majority of assets, the effect presented in the Environmental Statement has been assessed as being not significant (negligible to minor adverse effects). As such, it is concluded that the harm caused to these assets falls within the less than substantial category and at the lower level of the spectrum. In accordance with planning guidance and Historic England advice, a proportionate approach has been taken and these assets are not discussed further, however, they are included in the summary in Table 1. The reader is directed to **Chapter 7: Cultural Heritage** of the ES [EN010106/APP/6.1] for a full consideration of the impacts to these assets and Table 1 of this Statement for the categorisation of harm.
- 3.1.3 While there is no direct correlation between the significance of effect in EIA terms and the degree of harm referenced in national planning policy, it is acknowledged that those assets which are identified as experiencing a significant adverse effect are more likely to experience substantial harm. This note, therefore, provides further assessment of those heritage assets where significant effects have been identified in order to understand where on the harm spectrum this impact falls. The emphasis is placed on the level of impact for the purposes of this Heritage

Harm Statement. This is consistent with the NPS and the NPPF. 'Effect' is a purely EIA term which balances the impact of a development on the heritage significance of an asset. Harm is associated with the impact on the asset and is not influenced by an asset's heritage value.

- 3.1.4 In addition, this note only discusses harm in relation to designated assets. As referred to above, no non-designated assets have been identified as being of 'schedulable quality' and as such are not included in this Statement. Non-designated assets are discussed in **Chapter 7: Cultural Heritage** of the ES [EN010106/APP/6.1].
- 3.1.5 This note considers the significance of the assets to enable an understanding of how the impact is experienced. In particular, it establishes the degree to which the setting of an asset makes a contribution to significance, in recognition of the fact that no designated asset will be physically impacted by the Scheme. There follows a discussion of the impact of the Scheme on the identified significance, or on the ability to perceive that significance, and the resultant level of harm. This takes into consideration embedded mitigation within the Scheme.
- 3.1.6 The conclusion outlines the level of harm and the significance of the designated heritage assets affected by the Scheme, in accordance with national planning policy and guidance.

3.2 Statement of Significance

- 3.2.1 As reported within Chapter 7 of the Environmental Statement [EN010106/APP/6.1], the following designated assets (or assets of schedulable quality) have been identified as experiencing significant adverse effects on their heritage value:
- a. *Bowl barrow on Chalk Hill, 380m north west of Chalkhill Cottages (Scheduled Monument; NHLE 1018097);*
 - b. *Four bowl barrows north of the A11/A14 junction, part of the Chippenham barrow cemetery (Scheduled Monument; NHLE 1015246); and*
 - c. *Chippenham Grade II Registered Park and Garden (NHLE 1000615).*
- 3.2.2 The scheduled bowl barrows are of significance as individual features and as a group of linked assets. The barrows represent funerary monuments dating from the Late Neolithic period to the Late Bronze Age and can occur in isolation or in groups, as seen within the study area. The barrows also vary in construction with regional variations. Their survival is similarly varied. Originally designed to be visible landmarks located in prominent positions, many have now been eroded with their prominence degraded by intervening landscaping and development. However, their setting remains a key feature in their significance with inter-relationships between linked examples an important consideration.
- 3.2.3 The bowl barrow on Chalk Hill (Scheduled Monument NHLE 1018097) is located outside the Order limits, but within the study area for the EIA for Sunnica East Site B. The bowl barrow is described as a well-known landmark and is the only visible survivor of an immediate cluster of four barrows. It is also likely to form one of the barrows which make up a much larger group, the Chippenham barrow group, which extends into Cambridgeshire. Much of the mound has been

removed by excavation, but it remains of archaeological interest with potential survival of remains below ground. The monument is visible within the landscape, located on the crest of a hill overlooking the A11. Its setting has been further eroded by the presence of the Worlington Quarry and an existing solar farm at Bay Farm to the west. While the existing agricultural landscape represents a change in the setting of the asset, it is considered a neutral change as part of the evolving landscape and the asset does retain an appreciation of its historic setting. The setting is further enhanced by the identification of potential additional barrows within the fields to the north and east of the barrow as a result of geophysical survey of works areas E31 and E32 (works areas are shown on Figure 3-1 of the Environmental Statement [EN010106/APP/6.3]), expanding on the known barrows to the west.

3.2.4 Similarly, the four bowl barrows forming part of the Chippenham barrow cemetery (Scheduled Monument NHLE 1015246) form part of a larger funerary landscape and were designed to be prominent within the landscape with intervisibility between contemporary monuments a key feature in their historic interest. While many of the barrows have been degraded through ploughing, they retain a presence in the landscape and can continue to be read as a linked group. The barrows also have evident archaeological interest in the associated remains and in the information they provide on ritual practices and prehistoric settlement pattern. The majority of known barrows lie to the south of the Chippenham examples; therefore, the intervisibility is largely concentrated in this direction, albeit now severed by the A-road. However, a further two possible barrows have been identified through geophysical survey extending to the north in works areas W07 and W08 (works areas are shown on Figure 3-2 of the Environmental Statement [EN010106/APP/6.3]). The existing agricultural landscape to the north does not contribute to the significance of the asset but is considered to be a neutral change in their setting as part of the evolving landscape.

3.2.5 Chippenham Hall Registered Park and Garden (RPG Grade II; NHLE 1000615) includes 19th century pleasure grounds surrounded by a park laid out at the beginning of the 18th century and subsequently landscaped in the 1790s by William Emes and Samuel Lapidge. The RPG is set around The Hall, a Queen Anne revival country house (Grade II listed building; NHLE 1331778). The former 18th century main entrance drive extends approximately 3.2 km southwards from the Grade II* lodges and gateway (Grade II* listed building NHLE 1126376). The formal parkland is defined by its brick boundary walls, with the south drive extending towards Newmarket. While the wider rural landscape is not visible from within the park, it does form part of its setting, revealing evidence of the impact landowners had on the landscape, and forming part of the informal parkland context. The RPG, including the Hall also have an important relationship with the village of Chippenham to the north and this influence is visible within the arrangement of buildings and the predominant architectural style.

3.3 Harm Assessment

Chippenham Barrow Cemetery

3.3.1 The Four Bowl Barrows north of the A11/ A14 Junction (Scheduled Monument NHLE 1015246) form part of a wider barrow landscape with other examples situated to the south and east. The Scheduled Monument lies within the Order limits and, while not being developed itself, borders the solar PV developable

area of Sunnica West Site A. The ES concludes that the barrows will be adversely affected by visual intrusion on their setting, resulting in a medium magnitude of impact and moderate adverse effect.

- 3.3.2 The Scheme involves the installation of solar panels within the field adjacent to the scheduled barrows, and in the field to the west. To the north will be the BESS and substation. Existing woodland and hedgerows will be retained and enhanced as part of the Scheme, maintaining the field boundaries which form part of the agricultural landscape and providing some screening to the modern infrastructure.
- 3.3.3 The barrows form part of a larger funerary landscape and were designed to be prominent within the landscape, while intervisibility between contemporary monuments is a key feature in their archaeological interest. While many of the barrows have been degraded through ploughing, they retain a presence in the landscape and can continue to be read as a linked group. The majority of known barrows lie to the south of the Chippenham examples; therefore, the intervisibility is largely concentrated in this direction, albeit now severed by the A-road. However, a further two possible barrows have been identified through geophysical survey extending to the north in works areas W07 and W08 (works areas are shown on Figure 3-2 of the Environmental Statement [EN010106/APP/6.3]). The current relationship with the funerary landscape to the south will be maintained with the Scheme, with development concentrated to the north.
- 3.3.4 The existing agricultural landscape does not contribute to the significance of the asset, but is considered to be a neutral change in their setting as part of the evolving landscape. The introduction of the development represents a continuation of this and in this sense does not harm the significance of the barrows; however, the move from a naturalistic landscape to one of hard landscaping (i.e. the nature of the change) is considered to be harmful. The development will reduce the legibility of the funerary landscape by altering the experience of the assets, thus lessening the ability to appreciate their significance.
- 3.3.5 This harm will be reversible, lasting for the duration of the Scheme which will be decommissioned following 40 years of operation. This being secured as a requirement of the DCO. In addition, the Scheme will also involve the protection of the barrows from the potential for further plough damage. Taking this into consideration, the changes to the setting of the asset are considered to cause less than substantial harm to their significance.

Bowl barrow on Chalk Hill

- 3.3.6 The scheduled bowl barrow on Chalk Hill (NHLE 1018097) forms one of a line of four, straddling the A11, although it also relates to the wider funerary landscape which includes the Chippenham Cemetery. The barrow lies outside the Order limits and is separated from it by a thick belt of trees; however, the barrow will be adversely affected by the Scheme between the asset and any contemporary barrows within the wider landscape. The ES concludes that there is likely to be a low magnitude of impact and moderate adverse effect.
- 3.3.7 The Scheme involves the installation of solar PV panels to the north of the monument, behind the dense tree belt. There will, therefore, be no intervisibility

between the barrow and the Scheme. However, the barrow forms part of a wider complex and cannot be assessed in isolation. As with the Chippenham examples, the barrows form part of a larger funerary landscape and were designed to be prominent within the landscape with intervisibility between contemporary monuments a key feature in their archaeological interest. While many of the barrows have been degraded through ploughing, they retain a presence in the landscape and can continue to be read as a linked group. The Chalk Hill example is particularly prominent due to its position on a chalk ridge, although this dominance has been eroded by the construction of the A11 and tree planting.

- 3.3.8 The Chalk Hill example is the only upstanding of the four and continues to be prominent within the landscape, the rest having been substantially ploughed. A further two possible barrows have also been identified to the north during geophysical survey of the area (works areas E31 and E32, as shown on Figure 3-1 of the Environmental Statement [EN010106/APP/6.3]). While none of the barrows will be physically impacted by the Scheme, it will introduce a new element into their setting and affect the relationship between the scheduled example and those recently identified to the north. The existing surroundings are considered to be a construct of later land use and already affect the intervisibility between the barrows. The Scheme will continue this evolution of the landscape and is not in itself an impact; however, the move towards a hard landscape, rather than the naturalistic one, is considered to affect the appreciation of the relationship and thus harm its significance. This will not affect the barrow in isolation, although it will affect the perception of the barrow landscape. Taking all of this into account, it is considered to cause less than substantial harm. This also takes into account the existing solar farm to the south of the asset. As discussed above, this harm will be reversible, lasting for the 40 year duration of the Scheme.

Chippenham Hall RPG

- 3.3.9 Chippenham Hall RPG (Grade II, NHLE 1000615) will experience adverse effects as a result of the Scheme at Sunnica West (Site A and B). The impact arises from changes within the setting of the parkland. While the formal parkland and gardens surrounding the house are enclosed behind brick walls with dense vegetation, the surrounding rural landscape remains part of its setting and contributes to its character and significance. The former Avenue to the south remains largely open and, therefore, has a greater susceptibility to changes within the surrounding landscape. The ES concludes that there will be a permanent medium magnitude of impact, resulting in a moderate adverse effect.
- 3.3.10 The Scheme involves the installation of solar panels in fields to the east and west of the Avenue, at its southern extent, returning to the north on its eastern side. Embedded mitigation includes the enhancement of existing tree belts along the northern boundary of the development area, alongside grassland buffers along the northern boundary and within the Sunnica West Site A to break up development and reinforce existing field boundaries which characterise the rural character of the area. Specific mitigation has been included along the Avenue. This seeks to enhance the historic driveway with the planting of new native trees to reinstate the alignment of the Avenue and localised vegetation removal, which is considered a benefit. This will better reveal the intervisibility with the surrounding landscape, as intended, and raise the prominence of surviving veteran trees which formed part of the original planting. Screening of the solar panels will be through the planting of new hedgerows, offset from the Avenue by

an area of grassland planting. These, while screening the development, will enable wider views beyond, thus retaining the experience of the asset.

- 3.3.11 Despite the carefully designed mitigation, there remains an impact on the parkland due to the introduction of modern infrastructure within a formally agricultural landscape. The landscape will continue to be read as open fields; however, the modern infrastructure is in conflict with the natural setting of the asset. In addition, while the development will only be visible from within the designated area where it follows the Avenue, the fields remain part of the setting of the asset as a whole. With regard to the visibility from the Avenue, while not forming designed views, the wider landscape was intended to be appreciated as a kinetic view when travelling along the drive, thus glimpsed views of the surrounding fields are important in appreciating the asset. The Scheme will change the wider parkland leading to an impact on its significance. However, the character of the setting as individual fields will be maintained through the retention of existing boundaries, with development remaining low level. The development is also reversible, and, upon decommissioning the landscape can revert back to its current form. During the lifetime of the Scheme there will be harm to the significance of the asset but that harm will be less than substantial with the heritage significance not being lost or significantly altered.
- 3.3.12 Longer distance changes will occur through the Scheme at Sunnica West Site A. While these may cause a change in the wider landscape, any harm caused to the significance of the registered park is considered to lie at the lower level of less than substantial harm.
- 3.3.13 Within the Chippenham Park RPG are a number of designated structures, including the Grade II listed Hall (NHLE 1331788) and Dovecote (NHLE 1309915), and Grade II* listed Stable Block (NHLE 1126375) Lodges and Gateway to the south of the park (NHLE 1126376). While the setting of these assets, namely the park, will experience change as a result of the Scheme, there will be no harm to the significance of the assets themselves. This includes the lodges at the northern end of the Avenue. While the Scheme may be visible in gaps in vegetation, the understanding of the lodges as an entranceway into the formal parkland will not be affected.

4 Conclusion

- 4.1.1 Both the NPS EN-1 and NPPF require an assessment of harm to heritage significance. Both the NPS and the NPPF further categorise that harm into 'substantial' and 'less than substantial'. The PPG which supports the NPPF heritage policies expects potential harm to designated heritage assets to be categorised as either less than substantial harm or substantial harm (which includes total loss) and that within each category of harm identified, the extent of the harm should be clearly articulated.
- 4.1.2 **Chapter 7: Cultural Heritage** of the Environmental Statement [EN010106/APP/6.1] has identified a number of effects to designated and non-designated assets as a result of the proposals (outlined in Appendix A). The majority of these are not significant and in the case of the designated heritage assets affected can be reasonably equated with less than substantial harm, at the lower end of the spectrum.

- 4.1.3 The ES identifies significant effects to two scheduled monuments and a single Registered Park and Garden. Significant effects have a greater potential to represent substantial harm and have, therefore, been assessed in this Statement.
- 4.1.4 The scheduled barrows at Chippenham cemetery (NHLE 1015246) and Chalk Hill (NHLE 1018097) form part of a larger barrow landscape, alongside other scheduled examples and those identified during fieldwork for the Scheme. The scheduled examples represent the most visible within the landscape; however, there remains a tangible link between the remaining monuments, even where not visible. The setting of the barrows has changed significantly as the landscape has evolved. This includes not only modern development, including the establishment of settlements, road building and quarrying activities, but also the agricultural landscape itself which has been subject to subdivision and planting. The introduction of the solar panels represents a continuation of this evolution; however, the nature of the change, being one of modern infrastructure, remains an impact on the appreciation of the barrows as rural features. While not visible from the majority of the assets, there remains an effect on their understanding within the landscape. This is not considered to represent substantial harm to their significance, with the ability to appreciate their key characteristics maintained. Less than substantial harm to the significance of these assets as a result of the Scheme is therefore concluded.
- 4.1.5 The Grade II Registered Park and Garden at Chippenham Hall (NHLE10000615) represents a good example of a 19th century landscaped park with elements of 18th century features surviving. The formal pleasure grounds are set out around the main house and are defined by tall walls. This element will not be affected by the Scheme. The setting of the park will experience a change through alterations within the surrounding agricultural landscape. Specifically, the former Avenue to the south is included within the Order limits and will experience glimpsed views of the development. This change will alter the appreciation of the Avenue, but its function will remain and new planting will enhance the historic driveway to reinstate the alignment of the Avenue, which is considered a benefit. The overall change does not constitute substantial harm to the significance of the asset as a whole and therefore less than substantial harm to the significance of this asset as result of the Scheme is therefore concluded.

5 References

- Ref. 1 HMSO (2010) Infrastructure Planning (Decisions) Regulations 2010.
- Ref. 2 HMSO (1979); Ancient Monuments and Archaeological Areas Act 1979.
- Ref. 3 HMSO (1990) Planning (listed Buildings and Conservation Areas) Act 1990.
- Ref. 4 DECC (2011) National Policy Statement for Energy (EN-1).
- Ref. 5 Ministry of Housing, Communities and Local Government (MHCLG) (2019) National Planning Policy Framework.
- Ref. 6 Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance.
- Ref. 7 Historic England (2015) Historic Environment Good Practice Advice in Planning Note 2. Managing Significance in Decision Taking in the Historic Environment.

Table 1: Effects as reported in Environmental Statement and Harm Category Assessment Summary

Designation	Description	Description of impact	Additional Mitigation/Enhancement measure	Residual effect after mitigation	Harm category assessment
Sunnica East A					
Designated Asset – Conservation Area	Freckenham Conservation Area	The Scheme will be visible in views to the north of the settlement. This has the potential to affect the appreciation of the settlement within its rural landscape.	Any mitigation has been integrated into the design through enhancement planting along the Scheme's eastern edge . No further mitigation identified	Negligible Not significant	Less than substantial
Designated Asset – Conservation Area	Isleham Conservation Area	Impacts resulting from proximity of Scheme	Any mitigation has been integrated into the design through offsetting development to the north of Beck road. No further mitigation identified	Minor adverse Not significant	Less than substantial
Sunnica East Site B					
Designated Asset – Scheduled Monument NHLE 1018097	Beacon Hill, Chalk Hill Round Barrow – scheduled monument	Extant round barrow borders Order limits for Sunnica East Site B. The setting is directly impacted by presence of the Scheme.	Any mitigation has been integrated into the design through avoidance and offsetting. No further mitigation identified	Moderate adverse Significant	Less than substantial
Designated Asset – Scheduled Monument NHLE 1020395	Lumber Hill bowl barrow – scheduled monument	Extant round barrow located 1km from the scheme. This has the potential to affect the prominent setting of the asset within the landscape.	Any mitigation has been integrated into the design through avoidance. No further mitigation identified	Minor adverse Not significant	Less than substantial

Designation	Description	Description of impact	Additional Mitigation/Enhancement measure	Residual effect after mitigation	Harm category assessment
Designated Asset – Listed Building Grade I NHLE 1037585	Church of All Saints, Worlington	Potential impacts from the establishment of the Scheme within the setting of the asset that extends to the surrounding countryside.	Any mitigation has been integrated into the design through offsetting development along Freckenham Road. No further mitigation identified	Minor adverse Not significant	Less than substantial
Designated Asset – Conservation Area	Freckenham Conservation Area	The Scheme will be visible in views to the north of the settlement. This will affect the appreciation of the settlement within its rural landscape.	Any mitigation has been integrated into the design through offsetting development along Freckenham Road. No further mitigation identified	Minor adverse Not significant	Less than substantial
Designated Asset – Scheduled Monument NHLE 1006070	Freckenham Castle	Potential for impact from Intrusion within its setting from solar panel placement as part of the scheme.	Any mitigation has been integrated into the design through offsetting development along Freckenham Road. No further mitigation identified	Minor adverse Not significant	Less than substantial
Designated Asset – Listed Building Grade II NHLE 1037602	Grange Farmhouse	Part of the rural setting of the assets, including views of the assets towards the Scheme, will be adversely affected	Any mitigation has been integrated into the design through enhancement planting along Golf Links Road. No further mitigation identified	Negligible Not significant	Less than substantial
Designated Asset – Listed Building Grade II NHLE 1037604	The Manor	Part of the rural setting of the assets, including views of the assets towards the Scheme, will be adversely affected	Any mitigation has been integrated into the design through enhancement planting along Golf Links Road. No further mitigation identified	Negligible Not significant	Less than substantial

Designation	Description	Description of impact	Additional Mitigation/Enhancement measure	Residual effect after mitigation	Harm category assessment
Designated Asset – Listed Building Grade II NHLE 1126373	Badlingham Manor	The Scheme will come close to the asset, interrupting the open fields to the east and affecting its setting	Any mitigation has been integrated into the design through enhancement planting to Field E19. No further mitigation identified	Minor adverse Not significant	Less than substantial
Designated Asset – Listed Building II* NHLE 1126374	The Cottage	The Scheme will come close to the asset, interrupting the open fields to the east and affecting its setting	Any mitigation has been integrated into the design through enhancement planting to Field E19 and E22. No further mitigation identified	Negligible Not significant	Less than substantial
Sunnica West Site A					
Designated Asset – Scheduled Monument NHLE1015246,	Designated and non-designated Bronze Age barrows forming the western extent of the Chippenham Barrow Cemetery (MCB8995)	Within Order limits although not within developable area. The Scheme will change the character of the landscape immediately to the north-west of the barrow cemetery, and impact upon the setting of the monument; however, there will be no physical impact on the barrow cemetery	Any mitigation has been integrated into the design through avoidance. No further mitigation identified	Moderate adverse Significant	Less than substantial
Designated Asset – Scheduled Monument NHLE 1015243; 1015244 and 1015245	Three scheduled barrows forming part of the Chippenham barrow group	Potential for impact from Intrusion within its setting from solar panel placement as part of the scheme.	Any mitigation has been integrated into the design through enhancement planting and avoidance through detailed design. No further mitigation identified	Minor adverse Not significant	Less than substantial

Designation	Description	Description of impact	Additional Mitigation/Enhancement measure	Residual effect after mitigation	Harm category assessment
Designated Asset – Scheduled Monument NHLE 1015011	Howe Hill Bowl Barrow	Potential for impact from Intrusion within its setting from solar panel placement as part of the scheme.	Any mitigation has been integrated into the design through enhancement planting. No further mitigation identified	Minor adverse Not significant	<i>Less than substantial</i>
Designated Asset – Listed Building Grade II NHLE 1126383	Waterhall Farmhouse	Introduction of new structures in agricultural land that was historically associated with the asset	Any mitigation has been integrated into the design through enhancement planting. No further mitigation identified	Negligible Not significant	<i>Less than substantial</i>
Designated Asset – registered Park and Garden Grade II NHLE 1000615	Chippenham RPG	The Scheme will change the character of the wider parkland which forms the setting of the RPG	Any mitigation has been integrated into the design through offsetting and enhancement planting. No further mitigation identified	Moderate adverse Significant	<i>Less than substantial</i>
Designated Asset – Listed Building Grade II* NHLE 1126376	Triumphal arches	Affecting views from this asset to the surrounding countryside and change its setting	Any mitigation has been integrated into the design through offsetting and enhancement planting. No further mitigation identified	Minor adverse Not significant	<i>Less than substantial</i>
Designated Asset – Conservation Area	Snailwell Conservation Area	The Scheme will introduce infrastructure elements in the setting of this asset that are likely to affect the	Any mitigation has been integrated into the design through offsetting and	Minor adverse Not significant	<i>Less than substantial</i>

Designation	Description	Description of impact	Additional Mitigation/Enhancement measure	Residual effect after mitigation	Harm category assessment
		ability to understand and appreciate the asset as a rural settlement	enhancement planting. No further mitigation identified		
Designated Asset – Conservation Area	Newmarket Conservation Area	The Scheme will be visible in views to the north of the settlement.	Any mitigation has been integrated into the design through enhancement planting. No further mitigation identified	Negligible Not significant	No harm
Sunnica West Site B					
Designated Asset – Scheduled Monument NHLE 1006868	Roman Villa south of Snailwell Fen	Located immediately west of the proposed location of Sunnica West Site B, although outside the Order limits, with potential for impact upon significance through change to setting	Any mitigation has been integrated into the design through avoidance and detailed design. No further mitigation identified	Negligible Not significant	Less than substantial
Designated Asset – registered Park and Garden Grade II NHLE 1000615	Chippenham Hall RPG	The scheme will introduce new infrastructure elements within the wider parkland. Reduced by the incorporation of grassland mitigation.	Any mitigation has been integrated into the design through offsetting. No further mitigation identified	Minor adverse Not significant	Less than substantial
Designated Asset – Listed Building Grade II* NHLE 1162059	Park Farmhouse	Changes to rural setting	Any mitigation has been integrated into the design through enhancement planting. No further mitigation identified	Negligible Not significant	Less than substantial
Designated Asset – Listed	Phantom Cottage	Changes to rural setting	Any mitigation has been integrated into the design	Negligible	Less than substantial

Designation	Description	Description of impact	Additional Mitigation/Enhancement measure	Residual effect after mitigation	Harm category assessment
Building Grade II NHLE 1126385			though enhancement planting. No further mitigation identified	Not significant	